August 16, 1984

Mr. James G. Keppler Regional Administrator U.S. Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

Subject: Braidwood Station Units 1 and 2

10 CFR 50.55(e) Interim Report

Radiograph Film Density

NRC Docket Nos. 50-456 and 50-457

Reference (a): E. D. Swartz letter to J. G. Keppler

dated April 6, 1984

Dear Mr. Keppler:

On March 6, 1984, the Commonwealth Edison Company notified your office of a deficiency reportable pursuant to 10 CFR 50.55(e) regarding out of tolerance radiographic film densities at our Braidwood Station. Reference (a) provided information concerning this matter to fulfill the thirty day reporting requirements. For your tracking purposes, this deficiency was assigned Number 84-04.

The purpose of this letter is to provide your office with the updated status of our activities in this matter.

STATUS OF RESOLUTION

Since the submittal of our Reference (a) report, the total population of radiographs to be reviewed has been identified. The re-review completed as of July 20, 1984 by qualified Level II interpreters and Level III personnel, as necessary, has yielded the following results. Some quantities of weld radiographs have changed since the submittal of our Reference (a) report.

1) Total number of weld radiographs reviewed for densities and indications:

297 Welder Coupons

762 Field (Production) Radiographs

1,059 Weld Radiographs

8408300044 840816 PDR ADDCK 05000456 PDR

1/0 IED

Total number of weld radiographs found acceptable:

256 Welder Coupons 674 Field (Production) Radiographs

930 Weld Radiographs Acceptable

Total number of weld radiographs found rejectable:

41 Welder Coupons 88 Field (Production) Radiographs

129 Weld Radiographs Rejectable

Of the 129 rejectable weld radiographs, it was determined that except for isolated instances, the deficient radiographs were interpreted and/or reviewed by a single individual. The results of the expanded review of all film interpreted by the questionable reviewer through 1980, and a sample of film reviewed by all others through 1980 is complete and no deficiencies were identified. As a result, no further expansion of the current sample size is believed to be necessary. This activity is being tracked by the Commonwealth Edison NCR #609 Revision 1 and the PTL NCR #185.

The pipe welds whose radiographic film records exceed density requirements or contain questionable indications are currently being re-radiographed and will be repaired as necessary. As of July 20, 1984, approximately 24 of those identified have been re-radiographed. 22 of the 24 were acceptable and 2 are being repaired. Re-radiography of the remainder is in progress.

2) Total number of weld radiograph packages unreviewed for densities and indications from time span in question:

> 105 Welder Coupons 67 Field (Production) Radiographs

For the 67 unreviewed production weld radiographs, the Commonwealth Edison Company is in the process of retrieving these packages from vault storage. These packages will be transmitted to the site Independent Testing Agency (PTL) for review.

The status of the 105 unreviewed welder coupon radiographs is as follows:

86 cannot be retrieved due to completion of contractor work and departure from the Braidwood site. Because the respective codes governing the certification of welders (AWS D1.1-1975 and ASME Section IX 1974 Edition, Summer 1975 Addenda) do not require maintenance of the actual radiographs and/or coupons, it does not appear that subsequent radiography or review of these packages can be accomplished. We are still reviewing this matter to determine possible further actions.

19 welder coupon radiographs may be available and efforts are underway to retrieve them.

The review of film will continue until the balance of identified packages are reviewed.

DATE FOR COMPLETION OF ALL CORRECTIVE ACTION

Completion of film review is now expected by September 7, 1984. Completion of required re-radiographing and any subsequent re-work will be as soon as practical after completion of review.

Therefore, this report is considered an interim report with a final report to follow after completion of all required corrective actions.

Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,

E. Douglas Swartz Nuclear Licensing Administrator

cc: RIII Inspector - Braidwood

Director of Inspection and Enforcement US Nuclear Regulatory Commission Washington, DC 20555